

ARCHER & GREINER, P.C.
2 Penn Plaza, Suite 1500
New York, NY 10121
Tel: (212) 292-4988
Fax: (212) 629-4568
Stephen M. Packman, Esquire
Attorneys for Magnesium Electron Inc. and Magnesium Elektron Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

DELPHI CORPORATION, *et al.*,
Debtors.

Chapter 11

Case No. 05-44481 (RDD)
(Jointly Administered)

DELPHI CORPORATION, *et al.*,

Plaintiff,
v.

Adv. Pro. No. 07-02758 (RDD)

MAGNESIUM ELECTRON INC. and
MAGNESIUM ELEKTRON INC.,

Defendant.

**MAGNESIUM ELECTRON INC. AND MAGNESIUM ELEKTRON INC.'S
JOINDER IN SUR REPLIES IN FURTHER SUPPORT OF OBJECTIONS
AND BRIEFS WITH RESPECT TO REORGANIZED DEBTORS'
MOTION FOR LEAVE TO FILE AMENDED COMPLAINTS**

Defendant, Magnesium Electron Inc. and Magnesium Elektron Inc. ("Defendant"), by and through its attorneys, Archer & Greiner, A Professional Corporation, hereby joins in, and incorporates by reference, similarly situated defendants' sur-replies in further support of objections and briefs with respect to Reorganized Debtors' Motion for Leave to File Amended Complaints, including, without limitation: (1) Sur-Reply of Johnson Controls, Johnson Controls

Battery Group, and Johnson Controls, Inc. in Further Opposition to Plaintiff's Motion for Leave to File a First Amended Complaint dated June 13, 2011 (D.I. #21312); (2) Methode Electronics, Inc.'s Sur-Reply in Support of its Objection to the Reorganized Debtors' Motion for Leave to File Amended Complaints dated June 14, 2011 (D.I. #21319); (3) Ex-Cell-O Machine Tools, Inc.'s Sur-Reply in Support of Response to Plaintiff's Motion for Leave to File Amended Complaints, dated June 14, 2011 (D.I. #21321); and (4) Sur-Reply of Timkin Company and the Timkin Corporation in Further Opposition to the Reorganized Debtors' Motion for Leave to File Amended Complaints, dated June 14, 2011 (D.I. #21329).

In further support of this joinder, Defendant notes that unlike other proposed amended complaints filed by the Plaintiff in the various preference actions, in this case, Plaintiff failed to attach "Exhibit 1" to the Proposed Amended Complaint, thereby failing to identify (i) the date of the alleged preferential transfers, (ii) the amount of the alleged preferential transfers, or (iii) the antecedent debt.

Dated: June 17, 2011

ARCHER & GREINER, P.C.
*Attorneys for Magnesium Electron Inc. and
Magnesium Elektron Inc.*

/s/ Stephen M. Packman.
Stephen M. Packman
2 Penn Plaza, Suite 1500
New York, NY 10121
Tel: (212) 292-4988
Fax: (212) 629-4568
spackman@archerlaw.com